

Ct. Ex 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

LEV PARNAS and  
ANDREY KUKUSHKIN,  
Defendants.

S3 19-CR-725 (JPO)

J. PAUL OETKEN, District Judge

**PLEASE DO NOT READ FURTHER**

**UNTIL THE JUDGE TELLS YOU TO DO SO**

**QUESTIONS FOR JURORS**

1. As I mentioned before, this trial is expected to last approximately two weeks. Do you have any unmovable commitments that would prevent you from serving as a juror for this period of time?
2. Do you have any problem with your hearing or vision or any physical or medical issues that would prevent you from giving your full attention to all of the evidence presented during this trial?
3. Do you have any difficulty understanding or reading English?
4. Do you have any religious or ethical beliefs that would prevent you from passing judgment on another person, or make you unable to render a verdict based on the law and the evidence in this criminal case?
5. As I will explain in more detail later, the function of the jury is to decide the facts of the case, based on the evidence presented during the trial. However, when it comes to the law, you must take your instructions from me, and you may not substitute your own notions of what the law should be. Would you be reluctant or unwilling for any reason to follow my instructions as to the law to be applied in this case?
6. Do you have any personal knowledge of this case, or have you heard or read anything about the charges that I described?
7. Based on my summary of the charges, do you have any reason to believe that you could not be fair and impartial as a juror in this case?
8. Have you ever worked for, or do you have a family member or close friend who has worked for, any law enforcement agency — federal, state, or local — such as the FBI, a police department, a district attorney's office, or the United States Attorney's Office?
9. Have you, or has any family member or close friend, ever been involved with a legal action or dispute with the United States Government or any department, agency, or employee of the United States Government?
10. Have you had any other experience involving the United States Attorney's Office, the FBI, or any other law enforcement agency, that would make it difficult to be fair and impartial in this case?
11. Do you, or does any relative or close friend, work for a criminal defense lawyer or private investigator?
12. Do you, or does any family member or close friend, work in the court system (federal or state)?

13. Have you, or has any relative or close friend, ever been a witness to a crime or a victim of a crime?
14. Have you had any experience with the criminal justice system that would affect your ability to be fair and impartial in this case?
15. Have you, or has any relative or close friend, ever been involved in an investigation or appeared as a witness in an investigation by a grand jury, or by any government agency?
16. Have you ever testified as a witness in any legal proceeding or investigation?
17. Have you, or has any relative or close friend, ever been arrested or charged with a crime, or been the subject of a criminal investigation?
18. Have you ever served as a juror before in any type of case?
19. Have you ever served on a grand jury?
20. Do you have any legal training, or do you have any family members or close friends who are attorneys?
21. Do you know any of your fellow potential jurors?
22. As I said earlier, this case involves allegations of illegal campaign contributions made by a foreign national or in the name of individuals other than the person who funded the contribution. Is there anything about the nature of those allegations that might affect your ability to be fair and impartial as a juror?
23. Do you have any experience with or knowledge of the Federal Election Commission (FEC), or with campaign finance laws, that might affect your ability to be fair and impartial as a juror?
24. Have you, or has any family member or close friend, ever worked for a political campaign or worked in political fundraising?
25. This case involves aspects of the licensing processes in certain states to sell cannabis or marijuana. Do you have any experience with or strong feelings about cannabis businesses or licensing that might affect your ability to be fair and impartial as a juror?

26. The Government is represented here, as in all cases where it is a party before this Court, by the United States Attorney for the Southern District of New York, who is Damian Williams. This trial will be conducted by three Assistant United States Attorneys in that office: Aline Flodr, Nicolas Roos, and Hagan Scotten. Do you know or have you had any dealings with Mr. Williams, Ms. Flodr, Mr. Roos, or Mr. Scotten?

27. These are the names of certain other individuals from the government involved with this case. Do you know or have you had any dealings with any of the following:

Sarah (Sunny) Drescher  
Charlotte Cooper  
Patrick McCadden  
Andrew Taff  
Ryan Larkin  
John Vourderis

28. The Defendant Lev Parnas is represented by his defense attorneys, Joseph A. Bondy and Stephanie R. Schulman. Do you know or have you had any dealings with Mr. Parnas, Mr. Bondy, or Ms. Schulman?

29. The Defendant Andrey Kukushkin is represented by his defense attorneys Gerald Lefcourt and Faith Friedman. Do you know or have you had any dealings with Mr. Kukushkin, Mr. Lefcourt, or Ms. Friedman?

30. Do you know or have you had any dealings with any of the following individuals involved with the defense team:

Sheryl Reich  
Lindsey Latimer  
Renato Stabile  
Faye Honig  
Josh Dubin

31. The following are the names of certain individuals who may be witnesses in this trial or who may be mentioned during this trial. My question is whether you personally know or have had any dealings with any of these people:

Joseph Ahearn  
Caroline Boothe  
Alexander (Misha) Breyberg  
Charles Campos  
Anthony Casola  
Felix Vulis  
Wes Duncan  
Kim Espinoza

Madelyn Garcia  
Steven Gilbert  
Michael Hartsock  
Brad Hirsch  
Adam Laxalt  
Evan Preminger  
Neil Ross  
Daniel Stewart  
Ellen Thomas  
Deanna Van Rensburg  
Anne Spivey  
Andrey Muraviev  
Alexander Mikhalev  
Sergei Hrapunov  
David Correia  
Igor Fruman  
Steven Fruman  
Irina Gelfand  
Roy Bailey  
Robert Menendez  
Frank LoBiondo  
Bonnie Coleman  
Bill Pascrell, Jr  
Bob Hugin  
John Muniz  
Peter Kilmartin  
Kirsten Gillibrand  
Daniel Donovan  
Peter King  
Paul Tonko  
Letitia James  
Keith Wofford  
Andrew Cuomo  
Brian Mast  
Ashley Moody  
Ronald DeSantis  
Carlos Curbelo  
Rick Scott  
Dean Heller  
Xavier Becerra  
Gavin Newsom  
Kevin McCarthy  
Pete Sessions  
Rudolph Giuliani  
Pam Bondi  
Sheldon Adelson  
John Kelly



Joe Wilson  
Scott Wills  
Donald Trump  
Donald Trump Jr.  
Jared Kushner  
Ivanka Trump  
Tommy Hicks, Jr.  
Robert Pereira  
Harry Sergeant

Do you know or have you had any dealings with any of the people just listed?

32. The following are the names of certain entities or organizations that may be mentioned during this trial. Again, my question is whether you have had any dealings with any of these entities:

America First Action  
Protect the House  
Great America Committee  
Strategic Investment Group, Inc. (SIG)  
Nilder Investments Limited  
Intellect Capital  
KKMC, LLC  
Next Phase Holdings  
Oasis Venture Fund  
Oasis Venture LLC  
Palliatech  
FD Import & Export Corp.  
Global Energy Producers (GEP)  
Global Energy Partners  
National Republican Congressional Committee (NRCC)  
Trump International Hotel, Washington, DC  
Dubin Research & Consulting  
Medithrive  
Venture Rebel

Have you had any dealings with any of the entities just listed?

33. As you can tell from my prior questions, the fundamental issue here is whether there is anything in your personal history or life experience that would prevent you from acting as a fair and impartial juror here. Is there anything — whether I have asked specifically about it or not — that would affect your ability to serve as a fair and impartial juror in this case?

**QUESTIONS FOR INDIVIDUAL JURORS**

1. What is your county of residence?
2. How long have you lived there?
3. What level of school did you reach?
4. What kind of you work do you do? (If retired, what kind of work did you do?)
5. How long have you been in your current job?
6. Who are the members of your household?
7. What do they do for work?
8. Where do you get your news—television; websites; newspapers?
9. What magazines, newspapers, or books do you read?
10. What do you watch on television?

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